

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD
Plaintiff,

v.

TIMOTHY CALLAHAN, FRANCIS M.
ROACHE, PAUL MURPHY, RICHARD
WALSH, and THE CITY OF BOSTON,
Defendants.

C.A. NO.: 04-11193NG

**DEFENDANT RICHARD WALSH'S MOTION TO FILE
MEMORANDUM OF LAW IN EXCESS OF 20 PAGES
IN SUPPORT OF MOTION TO STRIKE PLAINTIFF'S RESPONSE TO
CONSOLIDATED STATEMENT OF UNDISPUTED MATERIAL FACTS
IN SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT**

NOW COMES Defendant Richard Walsh ("Walsh"), and respectfully requests that he be permitted to file a Memorandum of Law in excess of 20 pages in support of his Motion to Strike Plaintiff's Response to Consolidated Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment. As grounds, Walsh states that due to the nature of this case, the Consolidated Statement sets forth numerous statements of facts. Plaintiff has disagreed with many of the statements set forth in the Consolidated Statement and/or has made numerous additional statements which are the subject of Walsh's Motion to Strike. Consequently, additional pages are necessary in order for Walsh to fully and accurately address each such disagreement and additional statement by Plaintiff. Indeed, Plaintiff's responses to the Consolidated Statement are replete with factual inaccuracies and misrepresentations of the record. Walsh would be prejudiced if not permitted to fully address these deficiencies. Walsh notes that, for the Court's convenience and in order to fully address Plaintiff's misrepresentations

of the record, he has included in the Memorandum a significant amount of quotes of the cited testimony and that this the primary reason for the instant Motion.

WHEREFORE, Defendant Richard Walsh respectfully requests that this Honorable Court grant this Motion to file a Memorandum in excess of 20 pages.

Defendant,
RICHARD WALSH,
By its attorney,

DATED: December 26, 2007

/s/ Hugh R. Curran
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 26th day of December, 2007, I electronically filed with within document with the Clerk of the United States District Court for the District of Massachusetts, using the CM/ECF System. The following participants have received notice electronically:

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